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October 10, 2024

Hon. Elizabeth A. Pascal
United States District Court
District of New Jersey
Mitchell H. Cohen Building
4th & Cooper Streets
Camden, New Jersey 08101

**Re: Washington v. Wilson, et al.
22-cv-749 (KMW) (EAP)**

Dear Magistrate Judge Pascal:

I represent the Plaintiff, Sean Washington, in the above-referenced matter. I am writing to update the Court on the anticipated timeline for the Florida probate proceedings as to Sgt. Serapio Cruz's Estate.

First, I apologize to the Court for not submitting this letter yesterday as required. That was an oversight on my part.

As to the Petition to appoint a Curator to represent Sgt. Cruz's estate, that was filed on September 10, 2024 as I had noted in my prior status letters to the Court.

The next step in the process is filing the proposed order with the court. Ed Kuhn, who had been representing Sgt. Cruz, was waiting to hear from the County of Camden regarding his continued representation of the Estate once it is substituted. Earlier today he was advised that he will in fact be representing the County, and he notified me of that accordingly. I thereafter reached out to the Florida firm we retained to handle the probate proceedings—Matanzas Law Firm, P.A., to notify them of the anticipated representation so that they can move forward with filing the proposed order. However, I received an automatic response advising that beginning October 9, 2024, the office will be temporarily closed due to Hurricane Milton. The Matanzas Law Firm is located in St. Augustine, on the Florida east coast, and it has been significantly impacted by Hurricane Milton.

I do not know when the Florida office will reopen, but once it does, I believe they should be ready to file the proposed order with the court. Accordingly, I am requesting another two weeks, until October 23, 2024, to file a supplemental letter advising the Court as to the status of the probate proceedings.

Respectfully,

A handwritten signature in cursive script, appearing to read 'Mirel Fisch'.
Mirel Fisch

CC: All counsel via ECF